

**COURT OF COMMON PLEAS  
HAMILTON COUNTY, OHIO**

LAURENCE BENNETT  
8221 Asbury Hills Dr.  
Cincinnati, OH 45255

Plaintiff,

v.

SALLY BEAUTY HOLDINGS, INC.  
C/O Corporate Creations Network Inc.  
119 East Court Street  
Cincinnati, OH 45202

Defendant.

Case No. \_\_\_\_\_

Judge \_\_\_\_\_

**COMPLAINT WITH JURY DEMAND  
ENDORSED HEREON**

**PARTIES**

1. Plaintiff Laurence Bennett is a citizen and resident of the state of Ohio.
2. Defendant Sally Beauty Holdings, Inc. is a company that conducts business in the state of Ohio.
3. Defendant is an employer within the meaning of state law.

**FACTS**

4. Plaintiff was born in 1950.
5. Plaintiff began his employment with Defendant in 1987 and most recently held the position of Territory Sales.
6. Late in his career, Plaintiff was repeatedly asked by his managers when he was planning on retiring and was told he was "getting up there in age."
7. Plaintiff's clients were inexplicably redistributed to younger, less qualified salespeople, yet his sales goals were not adjusted.

**DEFENDANT'S  
EXHIBIT**

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8. Plaintiff required surgery and took medical leave.

9. When Plaintiff returned from a medical leave in May 2019, he was placed on a Performance Improvement Plan for his sales numbers and allegedly being unwilling to learn how to use an iPad assigned to him.

10. Meeting sales goals was difficult with clients being reassigned to younger employees.

11. Plaintiff was terminated on October 3, 2019.

### **COUNT I**

#### **(Age Discrimination - R.C. Chapter 4112)**

12. Plaintiff realleges the foregoing paragraphs as if fully rewritten herein.

13. Plaintiff is over 40 years old.

14. Defendants intentionally discriminated against Plaintiff on the basis of his age by, including but not limited to, treating him less favorably than similarly situated, significantly younger employees, and terminating his employment in violation of R.C. Chapter 4112.

15. Defendant's conduct was willful, intentional, wanton, malicious, and in conscious disregard of Plaintiff's rights.

16. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has suffered injury and damage and is entitled to relief.

WHEREFORE, Plaintiff Laurence Bennett prays for the following relief:

- (a) That Defendant be enjoined from further unlawful conduct as described in the Complaint;
- (b) That Plaintiff be reinstated to his employment;
- (c) That Plaintiff be awarded all lost pay and benefits;
- (d) That Plaintiff be awarded compensatory damages;

- (c) That Plaintiff be awarded punitive damages;
- (f) That Plaintiff be awarded pre-judgment and post-judgment interest;
- (g) That Plaintiff be compensated for the adverse tax consequences of receiving a lump sum award rather than his compensation over several, separate tax years;
- (h) That Plaintiff be awarded reasonable attorneys' fees and costs;
- (i) That Plaintiff be awarded all other legal and equitable relief to which he may be entitled.

Respectfully submitted,

/s/ Cara M. Daggitt

Cara M. Daggitt (0098927)

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**JURY DEMAND**

Plaintiff hereby demands a trial by jury on all issues so triable.

/s/ Cara M. Daggitt